

From: [Sandra Spence](#)
To: [Tina Laidlaw](#)
Subject: Re: Fw: Lower Gallatin
Date: 10/31/2012 10:04 AM

Sorry, been meaning to bring this up when we've chatted on the phone. Yes, I would like to talk about this....seems like MT is making impairment decisions in their TMDL documents and are using very limited data sets. Anyway, remind me next time we are on the phone and we can discuss.

Thanks,
Sandie

Sandra Spence
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▼ Tina Laidlaw---10/26/2012 10:42:26 AM---Sandie, This is an FYI -- just wanted you to be aware of the cross-pollination with TMDLs and nutrie

From: Tina Laidlaw/MO/R8/USEPA/US
To: Sandra Spence/R8/USEPA/US@EPA
Date: 10/26/2012 10:42 AM
Subject: Fw: Lower Gallatin

Sandie,

This is an FYI -- just wanted you to be aware of the cross-pollination with TMDLs and nutrients. We can discuss if you want to know more. At this point, we'll see how MDEQ responds to our comments.

Tina

Tina Laidlaw
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----- Forwarded by Tina Laidlaw/MO/R8/USEPA/US on 10/26/2012 10:37 AM -----

From: Tina Laidlaw/MO/R8/USEPA/US
To: gemathieus@mt.gov
Date: 10/25/2012 08:06 AM
Subject: Fw: Lower Gallatin

Here you go...

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----- Forwarded by Tina Laidlaw/MO/R8/USEPA/US on 10/25/2012 08:03 AM -----

From: Tina Laidlaw/MO/R8/USEPA/US
To: Jason Gildea/MO/R8/USEPA/US
Cc: Lisa Kusnierz/MO/R8/USEPA/US@EPA
Date: 10/24/2012 02:36 PM
Subject: Lower Gallatin

General Comments:

Thanks for the opportunity to review this document. My detailed comments are written on the document. I've included some general comments below along with some suggested edits to the response to comments. Feel free to disregard my suggestions. They may be completely out of whack b/c I'm clueless re. TMDLs.

But, thanks for letting me read the document and pester you guys with questions. VERY educational.

Tina

a) In general, this document is challenging to read. The segment breaks (based on AUs and related to differing nutrient criteria) make this very complicated to follow. A map showing the segments (and possibly the different criteria) would be very helpful. The watershed map shows the sampling locations but is not zoomed in enough for the reader to follow the assessment decisions.

b) Assessment decisions -- the document appears to loosely follow MDEQ's assessment methodology. However, attainment decisions do not exactly follow the new methodology so the impairment decisions appear somewhat arbitrary and based on a lot of BPJ. To address this issue, it would be helpful to clearly outline the process used to make decisions -- including cases where there are not adequate data to make an impairment call. Also, absent the minimum sample size, MDEQ decided to add a new TP listing to the lower Gallatin. That decision, as currently written, does not align with MDEQ's assessment methodology. One suggestion would be to list the lower segment for chl-a since chl data showed exceedances while there did not appear to be sufficient TP data to warrant a new listing. At a minimum, it would be helpful to include an explanation indicating why MDEQ decided to proceed with a TP TMDL.

Another concern is with the lack of diatom data. Diatom data should have been

collected at many of the sites but the data are not included in the TMDL document. As a result, assessment decisions where chl-a concentrations are met and the nutrient show slight exceedances appear to hinge primarily on the HBI values. This does not appear to follow MDEQ's assessment methodology.

c) I am not really familiar with how TMDL load allocations are established. That said, using a single sampling event to determine loads since like there would be a great deal of uncertainty in the proposed load reductions. Also, additional detail is needed to clarify how the loads were established. Perhaps the level of uncertainty could be captured somewhere in the document or could be tied to the need to have a Phased TMDL? But, that would seem logical given the limited available data.

d) I have provided some suggested revisions to the response to comments. The responses offer an excellent opportunity to address questions that continue to surface at the nutrient workgroup. As currently written, the responses may not adequately respond to the comments and are more likely to perpetuate the confusion.

e) Lastly, why isn't this a Phased TMDL?

[attachment "Appendix_H_Response_to_Public_Comments Tina Edits.docx" deleted by Sandra Spence/R8/USEPA/US]

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